

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

LINDA I. VALERINO

PLAINTIFF,

v.

**ERIC HOLDER, IN HIS OFFICIAL CAPACITY AS
UNITED STATES ATTORNEY GENERAL,**

DEFENDANT.

Civ. No. 08-cv-00035 (HB)

JURY TRIAL DEMANDED

REPLY TO NOTICE

AND NOW, COMES Yohana Manning, Esq. and hereby respond's to the Plaintiff's request for an order to show cause.

The undersigned counsel did not provide a detailed billing history of work done in this case to anyone but the Plaintiff. Counsel only provided a total of what said amount is to date. This was done because both parties were extraordinarily close to settlement, wherein both parties agreed to a sum and were negotiating terms and terminology. In the possibly more than one thousand (1,000) emails and telephone calls the undersigned has had to endure from the Plaintiff since re-entering his appearance this year, the Plaintiff represented to counsel that she could settle the case then *pro se*, receive the proceeds and then unilaterally reduce counsel's fees even further than counsel voluntarily offered to discount them in the first place. Said notice was intended to give notice of the full sum of the billed amount.

Respectfully submitted,

MANNING LEGAL SERVICES, P.C.

DATED: December 8, 2014

By: /s/Yohana Manning, Esq.
Yohana M. Manning, Esq.
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CERTIFICATE OF SERVICE

I certify that on December 8, 2014, I filed the foregoing electronically with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to:

Stephanie Fidler
Assistant United States Attorney
United States Attorney's Office
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ATTORNEY FOR DEFENDANT

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By: /s/ Yohana Manning
YOHANA MANNING, ESQ.
Attorney for Plaintiff